

In further support of its motion a for partial summary judgment in *MCHA Holdings, LLC v. Republic of Argentina*, 14-Civ-07637-TPG (S.D.N.Y. Feb. 27, 2015) (D.E. # 8) and *MCHA Holdings, LLC v. Republic of Argentina*, 14-Civ-10064-TPG (S.D.N.Y. Feb. 27, 2015) (D.E. # 6), Plaintiff MCHA Holdings, LLC (“MCHA” or “Plaintiff”), which is a non-judgment creditor, joins in Section I of the Reply Memorandum Of Law In Further Support Of The Motion By NML Capital, Ltd. For Partial Summary Judgment, dated April 7, 2015 (“Reply Memorandum of Law”), and all declarations submitted in support of the motion, to be filed in *NML Capital, Ltd. v. Republic of Argentina*, 14 Civ. 8601 (TPG), since the movants therein also bought bonds issued pursuant to the 1994 FAA, and there is no need to inundate the Court with multiple

memoranda of law making the same arguments. Plaintiff does not join in Section II of the Reply Memorandum of Law because that section is inapplicable to non-judgment creditors such as MCHA. Plaintiff also does not join in Section III of the Reply Memorandum of Law since the Republic has not challenged Plaintiff's proof of bond ownership.

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